

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0889

DIRECT EMAIL shecker@kaplanhecker.com

June 12, 2023

BY ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Neil Cole, 19 Cr. 869 (ER)

Dear Judge Ramos:

We represent Neil Cole in the above-captioned matter. We write to respectfully request an adjournment of sentencing, currently scheduled for July 25, 2023, to a date in the first week of October. Mr. Cole respectfully seeks an extension for two reasons.

[REDACTED]

Second, the parties continue to meet and confer in an effort to come to an agreement on the loss amount calculation. The adjournment would provide the parties additional time to reach an agreement in advance of sentencing.

For these same reasons, we respectfully request that the Court also extend Probation's deadlines for submitting a first and second draft of the presentence report, currently due June 15 and July 11, respectfully.

The government consents to this request. This is the second request for adjournment of the sentencing date.

KAPLAN HECKER & FINK LLP

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The parties are available to answer any questions the Court may have.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Sean Hecker", with a stylized, cursive script.

Sean Hecker